

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
PAUL ANTONELLIS, JR.)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO: 04-11678WGY
)	
TOWN OF SALISBURY AND TIMOTHY)	
MCINERNEY,)	
Defendants)	
_____)	

JOINT STATEMENT BY THE PARTIES

Pursuant to Rule 16.1(D) of the of the Local Rules of the United States District Court for the District of Massachusetts, the parties in the above-entitled matter propose the following pre-trial schedule:

I. DISCOVERY

A. PHASE ONE DISCOVERY

Last date to serve Request for Production of Documents January 31, 2005

Responses to Requests for Production of Documents thirty (30) days from service.

Last date to serve Interrogatories January 31, 2005

Response to all Interrogatories forty-five (45) days from service.

B. PHASE TWO DISCOVERY

Completion of fact depositions April 31, 2005

Plaintiff's disclosure of expert witness reports May 31, 2005

Last date to serve Request for Admissions April 30, 2005

Responses to Requests for Admissions thirty (30) days from service.

Defendant's disclosure of expert witness reports June 30, 2005

Completion of expert depositions August 31, 2005

II. SCHEDULE FOR MOTIONS

Filing of summary judgment motions September 31, 2005

Filing response to summary judgment motions October 20, 2005

Final Pre-Trial Conference November 15, 2005

Trial December 15, 2005

III. CERTIFICATION

Both parties' certification concerning compliance with Local Rule 16.1(D)(3) is attached to this joint statement.

Both parties consent to trial before a United States Magistrate Judge.

The Plaintiff
PAUL ANTONELLIS, JR.

The Defendants,
TOWN OF SALISBURY AND TIMOTHY
MCINERNEY,

/s/ Robert W. Walker
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